



August 28, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street S.W.
Washington, D.C. 20554

Re: Alaska Communications Systems, Notice of *Ex Parte* Communication,
WC Docket Nos. 10-90, 07-135, 05-337, 03-109, 09-197; CC Docket Nos.
01-92, 96-45, WT Docket No. 10-208, 12-187; GN Docket No. 09-51

Dear Ms. Dortch:

Pursuant to the requirements of Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, Alaska Communications Systems ("ACS") hereby discloses that, on August 27, 2012, Anand Vadapalli, President and Chief Executive Officer, and Leonard Steinberg, Senior Vice President and General Counsel, ACS, met in Anchorage, Alaska, with Commissioner Jessica Rosenworcel and her Legal Advisor, Priscilla Argeris, together with Andrea Sanders, Legislative Assistant for Senator Mark Begich, and Jason Suslavich, Senior Policy Advisor to Congressman Don Young. The materials attached to this letter were distributed during the meeting.

At the meeting, Mr. Vadapalli provided background on ACS's business commitment to delivering high quality communications services to its customers. He discussed the challenges ACS faces in providing voice and, where adequate transport facilities are available, broadband services, across Alaska. He pointed out that ACS serves at least 50 small isolated communities throughout the state, most of which are communities dominated by Alaskan Natives. In many cases, these communities are in areas that are not accessible by road, have no access to reliable electric service, and must be served by microwave or satellite facilities.

ACS focused on four key concerns regarding the Commission's ongoing examination of its universal service and intercarrier compensation rules. *First*, ACS discussed its recent acceptance of \$4,185,103 in Connect America Fund Phase I ("CAF Phase I") incremental support.¹ ACS explained in the meeting that the cost of construction of the necessary facilities will be far higher than can be economically justified. Additionally, the Commission staff has informed ACS that many of the locations it originally intended to use to meet its commitment may not meet the Commission's definition of "unserved." With the CAF Phase I incremental support level

¹ Letter from Amy Gardner, Vice President, Revenue Assurance, ACS, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 10-90, 05-337 (filed July 24, 2012).

unchanged at only \$775 per location, this new information has increased the already-prohibitive cost so dramatically that ACS doubts that there is a viable business case for utilizing all of the CAF I incremental funds given the rules set forth by the FCC. ACS is currently evaluating its options, and may seek a partial waiver of the conditions on CAF Phase I incremental support as an alternative to returning a portion of its award.

Second, ACS discussed its concerns regarding the Commission's efforts to develop the Connect America Fund Phase II ("CAF Phase II") universal service support mechanism, which were consistent with ACS's previous advocacy in these proceedings. ACS looks forward to participating in the Commission's upcoming CAF Phase II Cost Model Workshop in September 2012.

In connection with CAF Phase II funding, the Commission has imposed considerable additional service obligations in the form of increased broadband deployment and performance requirements. Despite these increased obligations, flaws in the current CQBAT model would sharply curtail the high cost support available to ACS.

ACS identified two primary flaws in the CQBAT model that cause it to substantially understate the costs of service, and therefore the level of support required, in Alaska. Initially, the CQBAT model is based on a limited set of network design options and relies on many network assumptions that are simply not true in Alaska. For example, the CQBAT model assumes that an Internet peering location always is located at a regional tandem within the ILEC LATA. In Alaska, the nearest Internet peering location is in Seattle, Washington. The CQBAT model fails to incorporate the substantial costs of transport associated with hauling traffic via undersea cable between Seattle and Anchorage, the northern landing point of the submarine cable ACS must use to transport this traffic. Moreover, the CQBAT model fails to recognize the substantial additional costs of transporting this traffic hundreds of miles further between Anchorage and distant points in remote areas of Alaska, many of which are not accessible by road, have no access to reliable electric service, and must be served by microwave or satellite facilities.

In addition, ACS believes that the inputs to the CQBAT model substantially understate costs in Alaska. Unfortunately, ACS and other parties have had only limited access to the CQBAT model, because the proponents of the model have not made available all of the necessary information about the underlying cost inputs. ACS continues to believe that any model the Commission adopts, along with the input values used to determine support amounts in particular areas, must be available for review by the public, such that the model and all underlying data, formulae, computations, and associated software must be available to all interested parties for review and comment. In addition, all underlying data should be verifiable, engineering assumptions reasonable, and outputs reasonable. Moreover, the public must have access, not just to the

underlying source code, but to the input data as well, in order to be able to test the model and offer modifications. Based on the outputs ACS has reviewed, however, ACS does not believe that any Alaska-specific costs were included in the CQBAT model.

ACS has offered two alternative solutions previously described in its comments. As a starting point, ACS has urged the Commission, in lieu of support based on the CQBAT model, to continue providing insular price cap LECs, such as ACS, with CAF support at Phase I levels, including both frozen and incremental Phase I support. Doing so would, at a minimum, avert the catastrophic consequences of the significant reductions in current support levels that the current CQBAT model would produce. In connection with this option, ACS has requested that the Commission concomitantly adjust the service requirements otherwise associated with CAF Phase II support, recognizing that the CAF I support levels were intended only to help defray the costs of providing voice service at affordable rates, and should not be expected also to cover the costs of building, maintaining, and operating broadband-capable networks.

In the alternative, ACS recommends that the Commission develop a model that accounts for the unique cost characteristics of providing voice and broadband services in Alaska. In furtherance of this goal, ACS has provided the Commission with a partial set of Alaska-specific cost inputs, modeled at ACS's own expense, reflecting the extraordinary transport requirements for broadband service in Alaska. If the Commission is determined to proceed with model-based support for Alaska, it should adopt a model specifically for price cap LECs serving insular areas, using cost inputs that the insular LECs supply, to determine the CAF Phase II support to be made available to insular price cap LECs such as ACS. ACS believes that such a separate model is the only way to fully recognize the unique service cost factors for high-cost, difficult to serve insular areas, specifically Alaska.

Third, ACS highlighted the importance of expedited Commission action on the recent ACS Wireless, Inc. ("ACS Wireless") Petition for Waiver of the July 2, 2012 filing deadline for its annual universal service report required pursuant to Section 54.313 of the Commission's rules, 47 C.F.R. § 54.313. ACS Wireless missed the filing deadline for this new mandatory report by five business days and, as a result, faces a loss of some \$5 million in universal service support for the period January-March 2013. ACS believes that this is an extremely harsh penalty for a minor violation that, if allowed to stand, will ultimately harm Alaska consumers who would have benefitted from new ACS Wireless infrastructure. Further, this penalty would compound universal service funding reductions ACS already expects from other changes to federal support mechanisms.

ACS therefore urged the Commission to grant the requested waiver. Uninterrupted support is critical to ACS Wireless's capital investment and operational plans. ACS

Wireless has never before missed a competitive eligible telecommunications carrier (“ETC”) filing deadline, and this error came amidst a crush of other regulatory compliance mandates. The July 2012 filing merely duplicated the ACS Wireless report filed with the Regulatory Commission of Alaska (“RCA”) in April 2012, and it has been publicly available since that time. Further, ACS expects that the RCA will timely certify to the Commission that ACS Wireless is in full compliance with its ETC rules. Granting a waiver on this basis would be fully consistent with Commission precedent.

Fourth, ACS discussed the merits of the AWN transaction, aspects of which are currently pending before the Commission for approval. The merits of the proposed infrastructure sharing agreement, and pointed out its consistency with policies set forth in the Commission’s November 2011 *USF/ICC Transformation Order*.

* * * * *

In accordance with the Commission’s rules, this notice is being filed electronically in the above-referenced dockets. Should you have any questions, please contact the undersigned at (202) 230-4962 or Richard.Cameron@acsalaska.com.

Very truly yours,



Richard R. Cameron
Assistant Vice President and Senior Counsel

Annual ETC Report – Waiver of Filing Deadline

- **ACS Wireless Petition for Waiver of Filing Deadline**
 - ACS filed a petition for waiver of the filing deadline on July 16, 2012
 - Absent a waiver ACS-W faces a loss of \$5M for 1Q2013 – this is in addition to the reduction in USF ACS expects due to the FCC's changes to the USF program
 - Support is critical to ACS-W capital investment and operational plans – loss will harm consumers
 - Support is required to meet RCA commitments
 - New procedures are being implemented to help prevent future filing delays

Annual ETC Report – Waiver of Filing Deadline

- **New filing requirement created by USF/ICC Transformation Order**
 - The Filing requirement was affected by three FCC Orders/Public Notices
 - During first year, limited to what the ETC provides the state regulatory commission
 - Due date changed From April 1 to July 2, 2012
- **In the confusion, ACS Wireless filed its report five business days late**
 - The same report was filed with the Regulatory Commission of Alaska in April
 - Crush of other regulatory demands contributed to the oversight
 - State and Federal Tariff Filings implementing new rate structure
 - FCC Tariff Suspension filing
 - Implementing new Lifeline rules, including recertification of subscriber base
 - Multiple sets of comments on numerous FCC proceedings

Annual ETC Report – Waiver of Filing Deadline

- **Expedited Commission Action is Critical**
 - Requested waiver is de minimis – ACS has not missed other CETC deadlines
 - The 2012 FCC filing duplicated the ACS-W filing at the RCA -- publicly available since April 2012
 - ACS expects the RCA to timely certify ACS-W's ETC compliance
 - Unless resolved by November 2012, ACS will commence implementation of contingency plans assuming the loss of \$5M in January – March 2013

CAF Phase I Incremental Support

- **USF/ICC Transformation Order provided up to \$300 million in incremental support for price cap ILEC deployment of broadband**
 - Each ILEC accepting this support must offer broadband to at least one previously unserved location for each \$775 of support it accepts
 - In total, ILECs accepted only \$115 million of the \$300 million available
- **ACS may seek a waiver of the \$775/location rule**
 - ACS accepted the full FCC award of \$4.2M, but may seek a waiver from the \$775/location rule (Windstream has already petitioned for a similar waiver)
 - Under the current rule, ACS will be required to offer new broadband service to over 5,400 new unserved customer locations
 - ACS accepts that CAF Phase I incremental support is intended to supplement expected ILEC co-investment
 - In the case of ACS, even with \$775 of support, more detailed analysis indicates that service is uneconomic to more than half of the 5400 locations

CAF Phase II Price Cap Carrier Support

- **CAF Phase II replaces traditional USF**
 - ACS currently receives approximately \$19M/year of frozen support
 - The FCC's proposal would reduce this to \$6.7M/year for only five years and require ACS to offer voice and broadband to all CAF-eligible locations in five years' time
- **The current version of the CQBAT model dramatically understates the level of support Alaska needs**
 - ACS would be required to deliver 4/1 broadband service today, and probably 6/1.5 five years after starting to receive CAF Phase II funding
- **In its present form, the CQBAT model could preclude additional ACS investment in broadband and jeopardize voice service as well**
 - The inputs to the CQBAT model are proprietary, preventing public scrutiny, but ACS believes that they substantially understate costs in Alaska
 - Middle mile transport by undersea cable to Seattle Internet POP
 - Intrastate transport from Anchorage cable landing to isolated end user locations
 - "National" cost inputs unreasonably low that fail to reflect Alaska costs

CAF Phase II Price Cap Carrier Support

- **ACS Solutions**

- The Commission should postpone implementation of model-based support for Alaska and other insular areas, leaving CAF Phase I support in place including frozen and incremental support
- If the Commission proceeds with model-based support, it should adopt the Alaska-specific cost inputs for:
 - The transport elements that are not even included in the proposed model, and
 - The facilities that are in the model but fail to reflect Alaska-specific costs
- Similarly, if the Commission proceeds with model-based support, it should adopt a model that is fully transparent to the parties



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96-45, WT Docket No. 10-208, GN Docket No. 09-51

Dear Ms. Dortch:

Pursuant to the requirements of Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, Alaska Communications Systems ("ACS") hereby discloses that, on July 26, 2012, at its offices in Anchorage, Alaska, representatives of ACS met with Geoffrey Blackwell and Irene Flannery of the Commission's Office of Native Affairs and Policy ("ONAP"), and Andrea Sanders, Legislative Assistant for Senator Mark Begich. ACS representatives participating in the meeting were Leonard Steinberg, Mike Todd, Amy Gardner, Lisa Phillips, and the undersigned (by telephone). The materials attached to this letter were displayed or distributed during the meeting.

At the meeting, ACS discussed the challenges ACS faces, and the successes it has enjoyed, in bringing voice and, where adequate transport facilities are available, broadband services to native Alaskans throughout the state. In particular, ACS discussed its recent acceptance of \$4,185,103 in Connect America Fund Phase I ("CAF I") support.¹ ACS explained that, despite this acceptance, the cost of construction of the facilities required to deliver broadband service to 5,401 new locations, required as a condition of the CAF I support, makes such service uneconomic for ACS. ACS is currently evaluating its options, and may seek a partial waiver of the CAF I conditions as an alternative to returning a portion of its CAF I award.

ACS also discussed its concerns regarding the Commission's efforts to develop the Connect America Fund Phase II ("CAF II") universal service support mechanism, which were consistent with ACS's previous advocacy in this proceeding. ACS explained that adoption of the CQBAT model in its present form could not only preclude additional ACS investments in broadband, but could also jeopardize ACS's ability to maintain basic voice services in remote areas of ACS's service territory, including Alaska Native villages it currently serves.

¹ Letter from Amy Gardner, Vice President, Revenue Assurance, ACS, to Marlene H. Dortch, Secretary, Federal Communications Commission, WC Docket Nos. 10-90, 05-337 (filed July 24, 2012).

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support levels were intended only to help defray the costs of providing voice service at affordable rates, and should not be expected also to cover the costs of building, maintaining, and operating broadband-capable networks.

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ACS also expressed dismay at the pricing policies adopted by General Communication Inc. ("GCI") for transport services on its TERRA-SW fiber optic and microwave transport facilities. Despite the fact that GCI constructed these facilities with federal grant funding and loan guarantees awarded under the Broadband Initiatives Program ("BIP") administered by the Rural Utilities Service, GCI continues to insist on excessively high rates for transport using these facilities that are equivalent to rates for satellite-delivered services.

Finally, ACS discussed its plans for implementing the recent guidance issued by ONAP, the Wireline Competition Bureau, and the Wireless Telecommunications Bureau regarding tribal government engagement obligations of communications service providers in connection with the implementation of the Connect America Fund.² Outreach and coordination with Alaska native governments, including the regional corporations and village corporations established under the Alaska Native Claims Settlement Act, is a vitally important component of ACS's service commitment.

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² Public Notice, WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, WT Docket No. 10-208, GN Docket No. 09-51, *Office of Native Affairs and Policy, Wireless Telecommunications Bureau, and Wireline Competition Bureau Issue Further Guidance on Tribal Government Engagement Obligation Provisions of the Connect America Fund*, DA 12-1165 (rel. July 19, 2012).

Marlene H. Dortch, Secretary
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Very truly yours,

A handwritten signature in blue ink that reads "Richard Cameron". The signature is fluid and cursive, with the first name "Richard" and last name "Cameron" clearly distinguishable.

Richard R. Cameron
Assistant Vice President and Senior Counsel

WORLD-CLASS TECHNOLOGY, BUILT FOR ALASKA AND BEYOND.

CONNECT

Connectivity where you need it, when you need it.

- Alaska's premier full service provider for wireless, wireline, Internet and advanced data network solutions.
- The Power of Two: Two fiber optic paths to the lower 48 and across Alaska offer redundancy and route diversity.
- Unmatched network security with global standards based MPLS and Metro Ethernet.

HOST

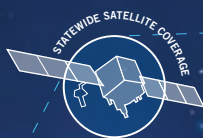
Data isn't everything. It's the only thing.

- In and out-of-state Hosted Data Centers support your business continuity and disaster recovery plans.
- Hosting and connectivity, for full, end-to-end data security.
- Ready to grow with you – as your business grows, our service expands with it.

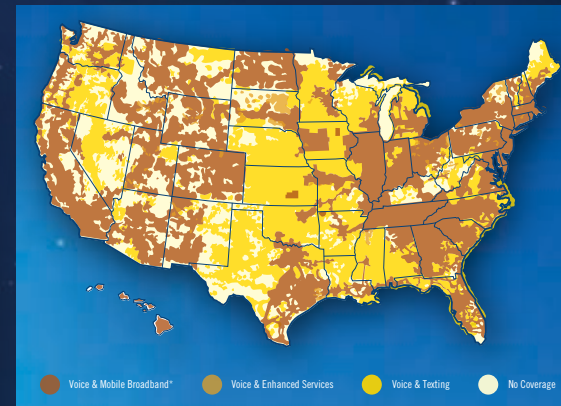
MANAGE

World-class capability begins with world-class people.

- 24/7/365 network monitoring.
- Two geographically diverse Integrated Network Management Centers.
- Personalized service from implementation to expansion.



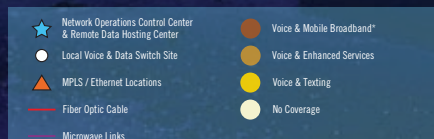
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www.alaskacommunications.com



*Updated on 10/16/10. This map is a geographical representation and coverage shown is approximate. Coverage includes both wired and leased assets. Service may not be available at all times or in all locations. Equipment, configuration, environment or other conditions may adversely affect service. Network coverage includes projected 2010 coverage information.

ACS Bush Communities

July 26, 2012

Community	Population*	Regional Corporation*	Village Corporation*	Tribal - Federally Recognized*	Accessibility (Road, Air, Water)*	Backhaul Type	Distance to Closest Fiber (Air Miles)	Closest Fiber Location
Akiok	82	Koniag, Inc.	Akiok-Kaguyak, Inc.	Native Village of Akiok	Air, Water	Satellite	88	Kodiak
Akutan	1,040	Aleut Corp.	The Akutan Corp.	Native Village of Akutan	Water, Float Plane	Satellite	483	Levelock
Angoon	466	Sealaska Corp.	Kootznoodoo Inc.	Angoon Community Assoc.	Water, Float Plane	Microwave	39	Sitka
Atka	58	Aleut Corp.	Atkam Corp.	Native Village of Atka	Air, Water	Satellite	823	Levelock
Alcan Border (Border City)	24	Doyon, Ltd.			Road	Satellite	80	Tok
Chignik	102	Bristol Bay Native Corp.	Far West, Inc.	Chignik Bay Tribal Council	Air, Water	Satellite	202	Levelock
Chignik Lagoon	77	Bristol Bay Native Corp.	Chignik Lagoon Native Corp.	Native Village of Chignik Lagoon	Air, Water	Satellite	205	Levelock
Chignik Lake	69	Bristol Bay Native Corp.	Chignik River Limited	Chignik Lake Village	Air	Satellite	209	Levelock
Coffman Cove	170	Sealaska Corp.			Water, Float Plane	Satellite	53	Petersburg
Egegik	113	Bristol Bay Native Corp.	Becharof Corp.	Egegik Village	Air, Water	Satellite	64	Levelock
Elfin Cove	18	Sealaska Corp.			Water, Float Plane	Microwave	82	Juneau
English Bay (Nanwalek)	276	Chugach Alaska Corp.	The English Bay Corp.	Native Village of Nanwalek	Air, Water	Satellite	24	Homer
False Pass	37	Aleut Corp.	Isanotski Corp.	Native Village of False Pass	Air, Water	Satellite	385	Levelock
Gustavus	460	Sealaska Corp.			Air, Water	Microwave	61	Juneau
Halibut Cove	77	Cook Inlet Region, Inc.			Water, Float Plane	Microwave	11	Homer
Hoonah	753	Sealaska Corp.	Huna Totem Corp.	Hoonah Indian Assoc.	Air, Water	Microwave	51	Juneau
Hughes	78	Doyon, Ltd.	K'oyitl'ots'ina, Ltd.	Hughes Village	Air	Satellite	103	Pump Station 5
Huslia	299	Doyon, Ltd.	K'oyitl'ots'ina, Ltd.	Huslia Village	Air	Satellite	167	Pump Station 5
Kake	579	Sealaska Corp.	Kake Tribal Corp.	Organized Village of Kake	Air, Water	Satellite	42	Petersburg
Kokhanok	179	Bristol Bay Native Corp.	Kokhanok Native Corp.	Kokhanok Village	Air, Water	Satellite	79	Levelock
Kaitag	205	Doyon, Ltd.	Gana-a'yo Ltd.	Village of Kaitag	Air	Satellite	229	Pump Station 5
Karluk	37	Koniag, Inc.	Koniag, Inc.	Native Village of Karluk	Air, Float Plane	Satellite	75	Kodiak
Kasaan	66	Sealaska Corp.	Kavito Inc.	Organized Village of Kasaan	Air, Water	Satellite	87	Petersburg
Klawock	813	Sealaska Corp.	Klawock Heenya Corp.	Klawock Cooperative Assoc.	Air, Water	Satellite	85	Petersburg
Koyukuk	97	Doyon, Ltd.	Gana-a'yo Ltd.	Koyukuk Native Village	Air, Water	Satellite	245	Pump Station 5
Larsen Bay	89	Koniag, Inc.	Koniag, Inc.	Native Village of Larsen Bay	Air, Water	Satellite	62	Kodiak
Port Heiden (Meshik)	101	Bristol Bay Native Corp.	Meshik Inc.	Native Village of Port Heiden	Air	Satellite	162	Levelock
Nelson Lagoon	45	Aleut Corp.	Nelson Lagoon Corp.	Native Village of Nelson Lagoon	Air, Water	Satellite	273	Levelock
Nikolski	16	Aleut Corp.	Chaluka Corp.	Native Village of Nikolski	Air	Satellite	627	Levelock
Nondalton	178	Bristol Bay Native Corp.	Kijik Corp.	Nondalton Village	Air, Water	Satellite	94	Levelock
Northway	76	Doyon, Ltd.	Northway Natives Inc.	Northway Village	Air, Road	Satellite	44	Tok
Nulato	275	Doyon, Ltd.	Gana-a'yo Ltd.	Nulato Village	Air	Satellite	277	Pump Station 5
Old Harbor	208	Koniag, Inc.	Old Harbor Native Corp.	Village of Old Harbor	Air, Water	Satellite	53	Kodiak
Ouzinkie	178	Koniag, Inc.	Ouzinkie Native Corp.	Native Village of Ouzinkie	Air, Water	Satellite	10	Kodiak
Pedro Bay	47	Bristol Bay Native Corp.	Pedro Bay Corp.	Pedro Bay Village	Air, Water	Satellite	86	Homer
Pelican	83	Sealaska Corp.			Water, Float Plane	Microwave	58	Sitka
Perryville	130	Bristol Bay Native Corp.	Oceanside Corp.	Native Village of Perryville	Air, Water	Satellite	235	Levelock
Pilot Point	88	Bristol Bay Native Corp.	Pilot Point Native Corp.	Native Village of Pilot Point	Air, Water	Satellite	105	Levelock
Point Baker	14	Sealaska Corp.			Float Plane, Helicopter	Microwave	41	Petersburg
Port Alexander	62	Sealaska Corp.			Water, Float Plane	Satellite	76	Sitka
Port Alsworth	156	Cook Inlet Region, Inc.	Tanalian, Inc.		Air (2 private airstrips)	Satellite	97	Homer
Port Graham	169	Chugach Alaska Corp.	The Port Graham Corp.	Native Village of Port Graham	Air	Satellite	23	Homer
Port Protection	53	Sealaska Corp.			Water, Float Plane	Microwave	42	Petersburg
St. George	97	Aleut Corp.	St. George Tanadgusik Corp.	Saint George Island	Air, Water	Satellite	499	Levelock
St. Paul	481	Aleut Corp.	Tanadgusik Corp.	Saint Paul Island	Air, Water	Satellite	504	Levelock
Seldovia	243	Cook Inlet Region, Inc.	Seldovia Native Association, Inc.	Seldovia Village Tribe	Air, Water	Microwave	15	Homer
Tenakee Springs	145	Sealaska Corp.			Water, Float Plane	Microwave	41	Sitka
Thorne Bay	496	Sealaska Corp.			Float Plane (Air via Klawock; Ferry via Hollis)	Satellite	78	Petersburg
Yakutat	656	Sealaska Corp.	Yak-Tat Kwaan Inc.	Yakutat Tlingit Tribe	Air, Water	Microwave	217	Juneau
Tutka Bay	Not Available	Not Available	Not Available	Not Available	Not Available	UNK	10	Homer

* Alaska Community Database Community Information Summaries. State of Alaska, Alaska Department of Commerce, Community, and Economic Development. July 23, 2012.
http://www.commerce.state.ak.us/dca/commdb/CF_CIS.htm